



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

July 2, 2015

Cindy Orlando, Superintendent
Hawaii Volcanoes National Park
Attn: DEIS—GMP, P.O. Box 52
Hawaii National Park, HI 96718-0052

Subject: Draft Environmental Impact Statement/General Management Plan /Wilderness Study, for the Hawaii Volcanoes National Park Project, Hawaii. (CEQ# 20150117).

Dear Mrs. Orlando:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Hawaii Volcanoes National Park Project, Hawaii. Our review is provided pursuant to the National Environmental Policy Act, the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

EPA supports the National Park Service's goals of protecting fundamental resources, such as marine, terrestrial, cultural and archeological assets. Based on our review of the DEIS, we have rated the proposed project as Lack of Objections (LO), please see the enclosed Summary of EPA Rating Definitions. Our rating is based on the Preferred Alternative 2, which promotes preservation of Hawaii Volcanoes National Park's Native Hawaiian values while strengthening and broadening opportunities to connect people with the park's volcanic treasures.

The project proposes to treat invasive plants with herbicide (page: 169). We recommend that the FEIS clearly identify which herbicide or pesticide products, if any, would be approved for use and in which areas. We recommend that the NPS include a commitment in the FEIS to adhere to pesticide label directions for any pesticide or herbicide application. We also recommend that the FEIS specify appropriate buffer zones to protect water quality from any pesticide/herbicide applications. We recommend that the FEIS describe how pesticide mixing and storage areas would be sited and managed to further protect water sources and other sensitive areas, such as food source and/or herb gathering areas.

On June 20, 2014, President Obama issued a memorandum directing Federal departments and agencies to evaluate and use their resources, facilities, and land management responsibilities to expand knowledge of pollinator health and to increase habitat quality and availability. While the DEIS acknowledges the importance of native pollinators to specific plant species, it is unclear what potential adverse impacts may occur to pollinators from proposed herbicide/pesticide use associated with the initial action. In May 2015, the Forest Service released a draft document in response to the President's memorandum, titled "Pollinator-Friendly Best Management Practices

for Federal Lands”, which states that “Eight broad considerations are key when evaluating projects for conserving pollinator habitat:

- determining the quality of foraging habitat;
- identifying important pollinator reproduction sites;
- determining important nesting and overwintering sites;
- identifying pollinators of sensitive or at-risk plant species on Federal, State, local, or nongovernmental organization (NGO) (e.g., NatureServe) lists as outlined in the National Academy of Sciences report Status of Pollinators in North America.
- identifying and removing invasive species to improve pollinator habitat;
- identifying, collecting, and using local, genetically appropriate native seeds;
- implementing adaptive management; and
- engaging and informing the public.”

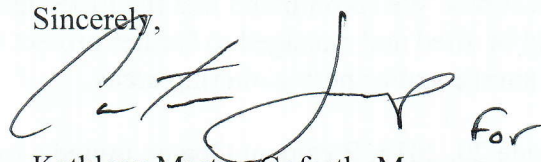
We recommend the NPS include, where appropriate in the FEIS, include similar best management practices to support pollinator health and affected ecosystems.

EPA encourages the NPS to ensure that meaningful consultation with all potentially affected Native Hawaiian stakeholders throughout the NEPA process. The project area is culturally and spiritually important to Native Hawaiian’s and consultation is an important component of the decision-making process associated with this project. We recommend that the results of consultations with Native Hawaiian stakeholders be included in the FEIS.

The proposed action could result in some new facilities, such as education pavilions campgrounds and picnic areas (page 293). EPA encourages the NPS to include a commitment to the development of sustainable green infrastructure as a guiding principle for future developments in the park.

EPA appreciates the opportunity to review this DEIS. When the FEIS is released, please send one hard copy and one CD to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3521, or have your staff contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3852 or Munson.James@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Martyn Goforth', with a stylized 'For' written to the right of the signature.

Kathleen Martyn Goforth, Manager
Environmental Review Section

Enclosure: Summary of the EPA Rating System

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

Category "1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category "2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category "3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment